

**P O R T E R | S C O T T**  
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Attorneys for Defendant COUNTY OF HUMBOLDT

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

TRINITY WILLIAMS, individually,

CASE NO.: 3:19-cv-01330-MMC

Plaintiffs,

**JOINT STIPULATION TO MODIFY PRE-  
TRIAL SCHEDULING ORDER AND  
[PROPOSED] ORDER**

v.

COUNTY OF HUMBOLDT and DOES 1  
through 50,

Defendants.

Complaint filed: 1/31/2019

This Stipulation is entered into by and between Plaintiff TRINITY WILLIAMS (“Plaintiff”) and Defendant COUNTY OF HUMBOLDT (“Defendant”) (collectively, “The Parties”) by and through their respective counsel. The Parties enter into this stipulation and proposed order in compliance with the Federal Rule of Civil Procedure 16(b) and the requirements of the scheduling order. The parties request to continue non-expert and expert discovery deadlines by approximately three months.

WHEREAS, trial in this matter is set for May 17, 2021;

WHEREAS, the parties participated in a Settlement Conference before Hon. Laurel Beeler on August 16, 2019. The Parties were unable to resolve the matter;

WHEREAS, as a result of the Settlement Conference, Defendant agreed to produce

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voluminous file materials to Plaintiff. The Parties further agreed to refrain from noticing depositions of Plaintiff and third-party witnesses until production of relevant documents by the Defendant;

WHEREAS, on September 4, 2019, Defendant produced approximately 6,000 documents to Plaintiff;

WHEREAS, on September 16, 2019, Defendant produced approximately 4,000 additional documents to Plaintiff;

WHEREAS, in response to concerns expressed by Plaintiff via meet and confer that Defendant has not produced significant tranches of responsive documents in its possession, Defendant is in the process of producing additional voluminous documents to Plaintiff;

WHEREAS, the parties have been participating in non-expert discovery, including the exchange of several sets of written discovery. The parties intend to engage in further discovery, including additional written discovery, depositions and third-party subpoenas;

WHEREAS, the Parties have not yet conducted any depositions in this matter;

WHEREAS, the Parties have met and conferred and propose the following scheduling amendments:

Non-expert Discovery Cutoff: August 1, 2020

Designation of Experts Plaintiff/Defendant: September 10, 2020

Designation of Rebuttal Experts: October 8, 2020

Expert Discovery Cutoff: November 12, 2020

Dispositive Motion: December 16, 2020

Dispositive Motion Hearing Date: January 22, 2020

The Parties submit that good cause exists to continue the above deadlines to allow the parties to complete voluminous document productions and complete the deposition of Plaintiff and third party witnesses.

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1 **IT IS SO STIPULATED.**

2  
3 Dated: February 4, 2020

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4  
5 By /s/ David R. Norton

6 Stephen E. Horan  
7 John R. Whitefleet  
8 David R. Norton  
9 Attorneys for Defendant  
COUNTY OF HUMBOLDT

10 Dated: February 4, 2020

BRAGG, MAINZER & FIRPO, LLP

11 By /s/ Benjamin H. Mainzer (authorized on February 4, 2020)

12 Benjamin H. Mainzer  
13 Attorney for Plaintiff TRINITY WILLIAMS

14  
15  
16 **ORDER**

17 Non-expert Discovery Cutoff: August 1, 2020

18 Designation of Experts Plaintiff/Defendant: September 10, 2020

19 Designation of Rebuttal Experts: October 8, 2020

20 Expert Discovery Cutoff: November 12, 2020

21 Dispositive Motion: December 16, 2020

22 Dispositive Motion Hearing Date: January 22, 2020

23 **IT IS SO ORDERED.**

24  
25 DATED: \_\_\_\_\_, 2020

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27  
28 UNITED STATES DISTRICT JUDGE